

**Archived:** Tuesday, January 27, 2026 7:37:37 PM

**From:** [Brandon Davis](#) [Brandon Davis](#)

**Sent:** Saturday, January 10, 2026 1:28:12 AM

**To:** [Jim Knoepp](#); [Dawson Morton](#); [Molly McDiarmid](#)

**Cc:** [Brandon Davis](#) [Trenny V. Williston](#); [Christina Tiberi](#); [Brandon Davis](#)

**Subject:** RE: 45136-0001 Soto Litigation RE: scheduling depositions in South Central Sugars suit

**Sensitivity:** Normal

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Jim (please disregard the hour – my house is quiet for a change, and it made sense to take advantage of the opportunity to manage work):

I just thought of Mr. Canela and wanted to communicate with you while his concern was top of mind. I shared this morning that Defendants would move for relief by way of a motion to compel and for protective order. But our talk this morning did not rehash our exchanges about Mr. Canela. We understood the position Plaintiffs articulated about Mr. Canela on or around December 15<sup>th</sup>. However, I don't want to make a compliance error by assuming you agree that our obligation to confer is satisfied. If Plaintiffs believe the parties should again confer about Mr. Canela, then tell us and I'll call you back Monday.

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**Brandon E. Davis**

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**From:** Brandon Davis <[Brandon.Davis@phelps.com](mailto:Brandon.Davis@phelps.com)>

**Sent:** Friday, January 9, 2026 11:58 PM

**To:** Jim Knoepp <[jim@dawsonmorton.com](mailto:jim@dawsonmorton.com)>; Dawson Morton <[dawson@dawsonmorton.com](mailto:dawson@dawsonmorton.com)>; Molly McDiarmid <[Molly.McDiarmid@phelps.com](mailto:Molly.McDiarmid@phelps.com)>

**Cc:** Trenny V. Williston <[Trenny.Williston@phelps.com](mailto:Trenny.Williston@phelps.com)>; Christina Tiberi <[Christina.Tiberi@phelps.com](mailto:Christina.Tiberi@phelps.com)>; Brandon Davis <[Brandon.Davis@phelps.com](mailto:Brandon.Davis@phelps.com)>

**Subject:** RE: 45136-0001 Soto Litigation RE: scheduling depositions in South Central Sugars suit

Good evening, Jim. Read my responses below.

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**From:** Jim Knoepp <[jim@dawsonmorton.com](mailto:jim@dawsonmorton.com)>

**Sent:** Friday, January 9, 2026 8:15 PM

**To:** Brandon Davis <[Brandon.Davis@phelps.com](mailto:Brandon.Davis@phelps.com)>; Dawson Morton <[dawson@dawsonmorton.com](mailto:dawson@dawsonmorton.com)>; Molly McDiarmid <[Molly.McDiarmid@phelps.com](mailto:Molly.McDiarmid@phelps.com)>

**Cc:** Trenny V. Williston <[Trenny.Williston@phelps.com](mailto:Trenny.Williston@phelps.com)>; Christina Tiberi <[Christina.Tiberi@phelps.com](mailto:Christina.Tiberi@phelps.com)>

**Subject:** Re: 45136-0001 Soto Litigation RE: scheduling depositions in South Central Sugars suit

Thanks. I still don't know what you mean by conferring next Thursday since that was never discussed. We talked by email and phone yesterday. I had proposed conferring next week on Thursday. But you explained that Plaintiffs preferred to speak more urgently and proposed 9 pacific this morning. So, I dialed at that time. I just want to be clear that we never declined to confer with you. And we did confer with you this morning on the only issue you wanted to discuss, which was related to Mr. Avila-Soto's deposition, and the issue we wanted to discuss, which was the scheduling of the depositions we asked about on December 19<sup>th</sup>. This is correct. The parties conferred this morning.

I am not sure why you think we would have reviewed 30(b)(6) topics with you on the call today when the purpose of the call was to discuss scheduling the depositions of **individual employees** and not 30(b)(6) depositions of the corporate defendants. **Your thoughts are wrong.** We stopped short of judging how Plaintiffs have managed their case. When you say "send your draft notice" are you referring to the draft notices of the individuals we asked to depose in our December 19<sup>th</sup> email? **No.** But if Plaintiffs intend to proceed per 30(b)(6), then tender notice and propose your availability to confer. We will certainly send you those notices as soon as you are able to confirm dates for the depositions on Monday. I believe the fact witness discovery work should align and – if not – the parties can resolve after we share contact information for Martina Aracely Zamorano Leyva and Juan Ignacio Martinez Camacho.

Thanks.

Jim

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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